

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

CHARLES TOWNSLEY, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	Case No. 1:20-cv-00969-DAE
	)	
INTERNATIONAL BUSINESS	)	
MACHINES CORPORATION,	)	
	)	
Defendant.	)	

**ORDER GRANTING DEFENDANT’S MOTION FOR PROTECTIVE ORDER**

Before the Court in the above-styled and numbered cause is Defendant International Business Machines Corporation’s (“IBM” or “Defendant”) Motion for Protective Order to Limit Scope of 30(b)(6) Depositions (ECF No. \_\_\_\_), filed June 7, 2022. Defendant asks the Court to enter a Protective Order limiting the scope of certain topics noticed by Plaintiffs pursuant to their Notice of Deposition of IBM’s Corporate Representative pursuant to Rule 30(b)(6) (“30(b)(6) Deposition Notice”). The Court, having reviewed Defendant’s Motion for Protective Order to Limit Scope of 30(b)(6) Depositions, all related pleadings, the applicable law, and the entire case file, determines that good cause has been shown for the entry of a Protective Order. Accordingly,

**IT IS HEREBY ORDERED** that Defendant’s Motion for Protective Order to Limit Scope of 30(b)(6) Depositions (ECF No. \_\_\_\_), filed June 7, 2022, is **GRANTED**.

**IT IS FURTHER ORDERED** that allowable testimony with regard to Topics 1, 2, 11, and 12 (as set forth in Defendant’s Motion for Protective Order) **SHALL BE LIMITED** to employees of IBM U.S. **IT IS FINALLY ORDERED** that the discovery of demographic data and testimony related to such data, as noticed in the 30(b)(6) Deposition Notice, **SHALL BE LIMITED** to employees of IBM U.S. who worked for the business groups in which Plaintiffs

worked at the time of their separation and to the resource actions within those business groups that were funded by the same funding pool (Concord, Maple, and Palm) as the resource action affecting each Plaintiff.

SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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DAVID ALAN EZRA  
SENIOR UNITED STATES DISTRICT  
JUDGE